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UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION

RAIZEL BLUMBERGER,

*Plaintiff,*

vs.

CALIFORNIA HOSPITAL  
MEDICAL CENTER, IAN B.  
TILLEY, M.D., *et al.*,

*Defendants.*

No. 22-cv-06066 FLA (JCx)

**STIPULATION TO EXTEND  
OPPOSITION DEADLINE TO  
MOTIONS TO REMAND AND  
CONTINUE HEARING DATE**

[Proposed] Order filed herewith]

Hearing date: June 6, 2025

Hearing time: 1:30 pm

Ctrm: 6B

Honorable Fernando L. Aenlle-Rocha  
United States District Judge

1 IT IS HEREBY STIPULATED by and between the parties, through their  
2 undersigned counsel, and subject to the Court's approval, to continue Defendant Ian  
3 B. Tilley's deadline to file an opposition to the United States's and Plaintiff's  
4 motions to remand to Friday, May 23, 2025, and to continue the hearing on those  
5 motions to July 11, 2025. The reasons for this stipulation are set forth in the  
6 accompanying Declaration of Matthew S. Freedus.

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8 LAW + BRANDMEYER LLP

9 /s/ Jacob Rosenberg

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21 *\* Pursuant to Local Rule 5-4.3.4(a)(2)(i), the filer attests that all signatories listed,*  
22 *and on whose behalf the filing is submitted, concur in the filing's content and have*  
*authorized the filing.*

**DECLARATION OF MATTHEW S. FREEDUS**

I, Matthew S. Freedus, do hereby declare and state as follows:

1. I represent Ian B. Tilley, M.D. in this removal action to assert his claim to immunity under 42 U.S.C. § 233(a). I make this declaration based upon my personal knowledge and familiarity with the record in these proceedings. If called as a witness and placed under oath, I could and would testify competently thereto.

2. I departed Feldesman Leifer LLP to move my practice to Powers Pyles Sutter & Verville PC, effective May 5, 2025. That transition—which included client elections and the transfer of files in numerous federal court cases—caused an inadvertent scheduling conflict with respect to the June 6, 2025 hearing date in this matter, along with other logistical challenges.

3. This request to extend the briefing schedule and hearing date is not for purposes of delay.

4. With the requested extension and continuance, I will have sufficient time to prepare a thorough and complete brief, which would be most helpful to the Court, and otherwise prepare for the related hearing.

5. Good cause also exists to grant the requested hearing date. The United States' counsel has informed me that he will be on prescheduled leave and unavailable for a hearing or to otherwise work on this case between June 16 through June 27. The requested hearing date is the first available date that accommodates the schedules for all counsel for the parties.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on May 15, 2025, in Washington, DC.

/s/ Matthew S. Freedus

**Certificate of Service**

On May 15, 2025, I certify that I electronically filed the foregoing with the clerk of the Court for the United States District Court for the Central District of California by using the CM/ECF system.

By: /s/ Matthew S. Freedus